

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
ALLISON REESE
Nevada Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: allison.reese@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO-SANCHEZ,

Defendant.

Case No. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

**STIPULATION AND PROPOSED
ORDER TO CONTINUE
SENTENCING FOR
CONSOLIDATED CASES**

Maria Mandujano-Sanchez, by and through counsel of record Michael Anthony Hernandez and Jacqueline Tirinnanzi, and the United States of America, by and through Assistant United States Attorney Allison Reese, hereby stipulate and request that the Court vacate Ms. Mandujano-Sanchez's sentencing hearing currently set for June 16, 2023, at 10:00 a.m. and continue it to June 27, 2023 at 11:00 a.m. This stipulation is made and based upon the following:

1. Counsel for the government will be out of the district during the currently scheduled sentencing hearing.
2. The parties agree to the continuance.
3. Ms. Mandujano-Sanchez is in custody and agrees to the proposed continuances.

4. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that, “the court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

5. This is the sixth request for a continuance of the sentencing in Case No. 2:21-cr-00328-GMN-DJA and the fourth request for a continuance of sentencing in Case No. 2:21-cr-00226-GMN-JCA. The additional time requested herein is not sought for purposes of delay. No further continuances are anticipated.

6. Denial of this request for a continuance would deny counsel for the government sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

Dated May 31, 2023.

/s/ Allison Reese
ALLISON REESE
Assistant United States Attorney

/s/ Michael Anthony Hernandez
MICHAEL ANTHONY HERNANDEZ, ESQ.
Counsel for Maria Mandujano-Sanchez

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Counsel for Maria Mandujano-Sanchez

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 MARIA MANDUJANO-SANCHEZ,

7 Defendant.
8

Case No. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

ORDER

9 **FINDINGS OF FACT**

10 1. Counsel for the government will be out of the district during the currently
11 scheduled sentencing hearing.

12 2. The parties agree to the continuance.

13 3. Ms. Mandujano-Sanchez is in custody and agrees to the proposed
14 continuances.

15 4. The additional time requested by this stipulation is reasonable pursuant to Fed.
16 R. Crim. P. 32(b)(2), which states that, “the court may, for good cause, change any time
17 limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not
18 implicate or undermine the defendant’s speedy trial rights under the United States
19 Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).

20 5. This is the sixth request for a continuance of the sentencing in Case No.
21 2:21-cr-00328-GMN-DJA and the fourth request for a continuance of sentencing in Case No.
22 2:21-cr-00226-GMN-JCA. The additional time requested herein is not sought for purposes of
23 delay. No further continuances are anticipated.
24

6. Denial of this request for a continuance would deny counsel for the government sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

CONCLUSION OF LAW

For all the above-stated reasons, the ends of justice are served by granting the requested continuance for the following reasons: Additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016). Failure to grant the continuance would deny parties sufficient time to meaningfully continue to prepare for sentencing, considering the exercise of due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

ORDER

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Ms. Mandujano-Sanchez’s sentencing hearing set for June 16, 2023, is hereby VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for June 27, 2023, at the hour of 11:00 a.m. in courtroom 7D.

Dated this 31 day of May 2023.



THE HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE